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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

JOSEPH DURAN, JOHN BELL, JASON MEARS,
VICTOR DESIMONE, CHRISTINA LEE and
SARAH CATALDO,

Plaintiffs,

vs.

THE HERSHEY COMPANY,

Defendant.

Case No. 3:14-CV-01184 RS

**STIPULATION AND ~~PROPOSED~~
ORDER TO EXTEND CERTAIN
DEADLINES**

Hon. Richard Seeborg

Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Joseph Duran, John Bell, Jason Mears, Victor DeSimone, Christina Lee, and Sarah Cataldo (“Plaintiffs”) and Defendant The Hershey Company (“Defendant”) (collectively, “Parties”), through their respective counsel of record, and subject to the approval of the Court, hereby stipulate as follows:

1. WHEREAS, on June 26, 2014, the Court issued a Case Management Order setting certain deadlines (Dkt. No. 23);

2. WHEREAS, the Parties are currently engaged in discovery, have scheduled certain depositions, and are working toward negotiating an ESI agreement;

3. WHEREAS, the parties have agreed to the extension of certain deadlines as follows:

Event	Current Deadline	Proposed Deadline
Expert Disclosures	January 22, 2015	March 17, 2015
Mediation Deadline	January 30, 2014	April 30, 2015
Supplemental and Rebuttal Expert Designations	February 12, 2015	April 7, 2015
Close of Fact and Expert Discovery	March 5, 2015	May 5, 2015
Case Management Conference	March 12, 2015	May 14, 2015
Deadline for Dispositive Motions to Be Heard	March 19, 2015	May 28, 2015
Motions in Limine	May 11, 2015	June 11, 2015
Oppositions to Motions in Limine	May 18, 2015	June 18, 2015
Final Pretrial Conference	May 21, 2015	June 25, 2015

4. WHEREAS, the Parties have previously requested an extension of the mediation deadline, but have not requested extensions of the other deadlines;

5. WHEREAS, the Parties do not believe that an extension of these deadline will affect the Court’s schedule for this case, including the trial date (July 13, 2015).

THEREFORE, the Parties hereby agree and stipulate to the proposed deadlines included above.

1 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

2
3 DATED: December 30, 2014.

MORGAN, LEWIS & BOCKIUS LLP
DARYL S. LANDY
MICHAEL J. PUMA
CHRISTOPHER D. HAVENER

6 By: /s/Michael J. Puma

Michael J. Puma

8 Attorneys for Defendant
THE HERSHEY COMPANY

11
12 DATED: December 30, 2014.

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15 HOBAN & FEOLA, LLC
DAVID C. FEOLA

17 By: /s/ David C. Feola

David C. Feola

19 Attorneys for Plaintiffs

20 PURSUANT TO STIPULATION, IT IS SO ORDERED.

21
22 DATED: 1/2/15



Hon. Richard Seeborg
United States District Court Judge